

# EXHIBIT O

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

- - - - - x  
:  
UNITED STATES OF AMERICA  
:  
- v. -  
:  
VIRGIL FLAVIU GEORGESCU,  
:  
Defendant.  
:  
- - - - - x

STIPULATION

14 Cr. 799 (RA)

IT IS HEREBY STIPULATED AND AGREED by and among the United States of America, by Preet Bharara, United States Attorney for the Southern District of New York, Ilan Graff and Andrea Surratt, Assistant United States Attorneys; of counsel, and VIRGIL FLAVIU GEORGESCU, the defendant, with the consent of his attorney, Albert Dayan, Esq., respectively, that:

1. In approximately early June 2001, GEORGESCU, on his own initiative, visited the Federal Bureau of Investigation ("FBI") Field Office in Las Vegas, Nevada.

2. At this initial meeting in early June 2001, GEORGESCU told FBI agents that he could provide information about credit card fraud, immigration fraud, identity theft, drugs, prostitution, and burglaries. GEORGESCU told the agents that he did not want to be known as an "informant," and did not want to have to testify in court.

3. GEORGESCU officially began work as an FBI source on

or about July 5, 2001. GEORGESCU thereafter continued to meet with FBI agents, who were now assigned as GEORGESCU's handlers, on a regular basis. At these meetings, GEORGESCU continued to provide information about the criminal activities of other people.

4. On one occasion, pursuant to FBI agents' instructions, GEORGESCU travelled within the United States. GEORGESCU was reimbursed by the FBI for his travel expenses in connection with this trip.


5. GEORGESCU was officially closed as an FBI source in August 2003. During the period that GEORGESCU was an FBI source, the information that he reported was used as part of multiple investigations, including investigations that resulted in criminal charges. GEORGESCU did not receive any monetary compensation for his cooperation with the FBI.

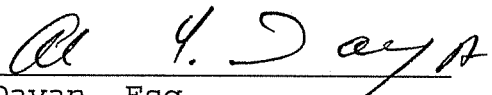
6. In June 2001, as part of becoming an FBI informant, GEORGESCU signed the FBI's rules for criminal informants, which is marked as Government Exhibit 502. In June 2002, for a second time, GEORGESCU was advised of the FBI's rules for criminal informants, which is marked as Government Exhibit 503.

IT IS FURTHER STIPULATED AND AGREED that this stipulation, and Government Exhibits 502 and 503, may be received in evidence at trial.

Dated: New York, New York  
April 28, 2016

PREET BHARARA  
United States Attorney  
Southern District of New York

By:   
\_\_\_\_\_  
Ilan Graff  
Andrea Surratt  
Assistant United States Attorneys

By:   
\_\_\_\_\_  
Albert Dayan, Esq.  
Attorney for Defendant VIRGIL FLAVIU  
GEORGESCU  
